

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WOORI BANK,

Plaintiff,

- against -

CITIGROUP GLOBAL MARKETS INC.,

Defendants.

No. 12 Civ. 3868 (LTS)
ECF Case

**NOTICE OF CITIGROUP
GLOBAL MARKETS INC.'S
MOTION TO DISMISS THE
AMENDED COMPLAINT**

PLEASE TAKE NOTICE THAT, upon the Declaration of Marques S. Tracy with attached exhibits, the accompanying Memorandum of Law in Support of Citigroup Global Market Inc.'s Motion to Dismiss the Amended Complaint, the Declaration of Don-Hui Lee, and all prior pleadings and proceedings, Defendant Citigroup Global Markets Inc. ("CGMI") will move this Court, before the Honorable Laura T. Swain, United States District Judge for the Southern District of New York, on a date and time to be set by the Court, for an order pursuant to Fed. R. Civ. P. 12(b)(6) dismissing the Amended Complaint in its entirety with prejudice in this action. The basis for the motion is set forth in the accompanying memorandum of law.

Pursuant to Rule A(2)(b) of Judge Swain's Individual Practices, CGMI, through its counsel, certifies that it has used its best efforts to resolve informally the matters raised in its Motion to Dismiss the Amended Complaint. On September 5, 2013, counsel for CGMI and plaintiff Woori Bank ("Woori") discussed CGMI's intention to move to dismiss on the grounds that the Amended Complaint is time-barred and that Woori has failed to plead justifiable reliance as a matter of law. Based on this discussion, the parties understood that it would not be possible to resolve these matters prior to CGMI's filing of its Motion to Dismiss the Amended Complaint. CGMI memorialized this conversation by letter to Woori's counsel on October 7, 2013.

Dated: New York, New York
October 9, 2013

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP

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